

Whalen, Marilyn

From: Beth Lucas <blucas4@verizon.net>
Sent: Friday, August 08, 2014 4:32 PM
To: Huetteman, Tom; Wilson, Patrick; Scott, Jeff; Blumenfeld, Jared; Armann, Steve; brd@smmusd.org; slyon@smmusd.org; ballen@smmusd.org; odelatorre@smmusd.org; jescarce@smmusd.org; mvasquez@smmusd.org; rmechur@smmusd.org; npatel@smmusd.org; llieberman@smmusd.org; 'Beth Lucas'; Wedell, Kelly
Cc: 'Beth Lucas'; jhouse@malibucity.org; Skylar Peak; LRosenthal@malibucity.org; llamonte@malibucity.org; jsibert@malibucity.org
Subject: RE: Questions for EPA & SMMUSD (Re: PCBS in excess of 50 ppm at MHS in violation of Federal Law and more...)

Hello Everyone,

I am both disappointed and frustrated at the lack of response to my initial questions from last week and my numerous attempts to obtain information this week are seemingly being ignored regarding the fundamental question on why is Federal Law being knowingly violated, and not being followed related to the removal of PCBs above 50 ppm in the Malibu Schools?

I received this yesterday, yet even though I called Kelly back immediately, left a voicemail and left an e-mail. No response... Now she is out of the office for several days. And I have left multiple voicemails with Tom Huetteman, who initially said someone would like to speak with me. No response. I can't even get anyone to call me back... and your team early this week said you wanted to have an expert call me! What is up? I honestly feel like I am getting the run around... and from the EPA who I have always admired. I am so disappointed and discouraged.

My questions are simple and fundamental. I am just a very concerned parent trying to get some answers to some important questions that impact my children about carcinogenic PCB toxins being left in their schools that are at levels in violation of Federal Law.

Can someone please help and give me the courtesy of a response?

Thanks you.

Beth

"Dear Beth,

Thank you for your questions related to the PCBs at Malibu High School. EPA shares the community's concerns and is working with the district to ensure the safety of the students, teachers, and faculty who use these facilities at the campus. EPA expects to have further information/correspondence on this issue soon, and will gladly send it to you as it becomes available.

For your future reference, I will now be serving as the liaison for community input on all issues related to PCBs at Malibu High School.

Thanks so much for your patience.

Best,

Kelly

Kelly Wedell

Project Officer
Planning and State Development Office
US EPA Region 9

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75 Hawthorne St., LND-1-1
San Francisco, CA 94105

From: Beth Lucas [mailto:blucas4@verizon.net]
Sent: Wednesday, August 06, 2014 7:01 PM
To: 'Huetteman, Tom'; 'Wilson, Patrick'; 'Scott, Jeff'; blumenfeld.jared@epa.gov; Armann.Steve@epa.gov; brd@smmusd.org; slyon@smmusd.org; ballen@smmusd.org; odelatorre@smmusd.org; jescarce@smmusd.org; mvasquez@smmusd.org; rmechur@smmusd.org; npatel@smmusd.org; llieberman@smmusd.org
Cc: 'Beth Lucas'
Subject: Questions for EPA & SMMUSD (Re: PCBs in excess of 50 ppm at MHS in violation of Federal Law and more...)

Hello All,

I have been patiently awaiting a written response to my questions below. I am happy to speak with an EPA representative as you suggested, but only after I have some concrete responses in writing that we can then converse about. I never received a reply back on Monday regarding my question as to when I could expect a written response.

I appreciate the updates from the SMMUSD and as a prior marketing professional and manager, I clearly recognize your current marketing/PR strategy of frequent and repeat messaging.

But as a parent, there is one key message that is completely missing and it has to do with the questions regarding why are the District and EPA seemingly OK with violating Federal Law and leaving unsafe levels of PCBs above 50 ppm in place in multiple buildings, and how can you “open” up those building and proclaim them “safe”? And, especially since the EPA (Steve Armann in a letter dated January 27) stated clearly that these PCBs in the caulk should be removed. Where is the plan for that removal?

Here is another cut at some of my questions (and some are new) and I still have my initial questions below. I also have some excerpts from a letter from Steve Armann (EPA) indicating that the PCBs above 50 ppm needed to be in the district’s plan for removal (and I assume that waiting 15 years to do so would not be considered acceptable by the EPA!) so I am confused

by the EPA's recent communications approving of the Districts' actions and plans when this critically important issue is not being addressed.

Can somebody please reply to these questions and my other initial questions below?

Thank you so much in advance. I know you are all busy, but clearly these are questions you should be able to respond to in writing.

I am trusting that you all want to keep our children, teachers and staff safe, so please explain to me how that is going to be accomplished if the PCBs above 50 ppm are not remediated per Federal Law and as per Steve Armann's prior letter to the District?

I am eagerly awaiting your response. By the way, the lack of a written response is not a good marketing/PR strategy. It gives the appearance of avoidance, which then leads to the question of why? I am trusting that is not what you are doing, so again I look forward to hearing from you with specific answers very soon.

Thank you in advance.

Beth Lucas

QUESTION #1 (with sub-questions)

I have reviewed all of the updates both from the district and from other sources, but my fundamental question remains:

How can we as parents be assured that our school is safe if PCBs above 50 ppm in the building materials remain in multiple buildings on campus (in violation of Federal Law)?

I think all of the cleaning that has happened this summer is really great, but if our school buildings still have PCBs above what is allowed by Federal Law, I am very confused as to why this is considered acceptable and safe? And what is the plan and timeframe to remediate those PCBs found in violation of Federal Law as I have not seen anything specific about that either? Federal Laws are put in place for a reason, so why are they seemingly being circumvented in this situation?

This is my understanding on the law:

TSCA PCB Regulations.

40 CFR 761.20: In addition, the (EPA) Administrator hereby finds, under the authority of section 12(a)(2) of TSCA, that

the manufacture, processing, and distribution in commerce of PCBs at concentrations of 50 ppm or greater and PCB ITEMS WITH PCB CONCENTRATIONS OF 50 PPM OR GREATER PRESENT AN UNREASONABLE RISK OF INJURY TO HEALTH WITHIN THE UNITED STATES. This finding is based upon the WELL-DOCUMENTED HUMAN HEALTH AND ENVIRONMENTAL HAZARD OF PCB EXPOSURE, the high probability of human and environmental exposure to PCBs and PCB Items from manufacturing, processing, or distribution activities; and the evidence that CONTAMINATION OF THE ENVIRONMENT BY PCBs IS SPREAD FAR BEYOND THE AREAS WHERE THEY ARE USED. In addition, the Administrator hereby finds, for purposes of section 6(e)(2)(C) of TSCA, that ANY EXPOSURE OF HUMAN BEINGS OR THE ENVIRONMENT TO PCBs, as measured or detected by any scientifically acceptable analytical method, may be SIGNIFICANT

I have sent multiple e-mails to asking these questions (see below) and yet I still do not have a specific written response, so how they can you state our schools our safe, while a Federal Law put in place to protect our health (and in this case, the health of teachers, staff and precious children) is being violated?

QUESTION #2

I also have a related question as follows:

Where is the compliance by the district with the following regarding PCBs found above 50 ppm and why is the EPA seemingly not enforcing what they originally requested of the district by the EPA in writing?

Following are some excerpts from some letters sent by the EPA to the District

Excerpts begin:

On June 4th, 2014, the EPA gave the district 30 days to submit a plan for MHS that at least meets the requirements of Steve Armann's Jan 27th, 2014 letter.

June 4th, 2014

Dear Superintendent Lyon:

The document (submitted) needs significant restructuring...We will review and approve the MHS plan (due in 30 days) to address PCB contamination resulting from caulk know to have PCB concentrations greater than 50ppm. We intend to approve the MHS plan under the most applicable section of the Toxic Substance Control Act (TSCA) regulation for PCBs... We do not intend to approve the General Plan (which is)...The "Building Material Inspection Plan" and the "**PCB Best Management Practices**" **contained in the General Plan do not require EPA approval...**

In our January 27, 2014 letter (EPA letter), we requested that SMMUSD submit a plan for MHS that at a minimum would address **removal of all caulk know to contain PCB levels at 50ppm or higher,**

mitigation of removal of any deteriorating caulk in pre-1979 structures at MHS and development of an air sampling plan for EPA approval.

Instead of developing a specific PCB Cleanup Plan for MHS, Envriion (submitted) Building Materials Inspection plan and Best Management Practices... via a General Plan. Those two documents combined are not the specific plan that we requested for the MHS, and that specific plan still needs to be submitted for approval.

...As stated in the cover letter, EPA wil not be approving the District-side Plan (Best Management Practices cleaning plan).

...5. If caulk with PCBs equal to or above 50ppm is proposed to be encapsulated, such approach, if approved by the EPA, would be a short-term alternative to minimize exposure to PCBs. Such alternative would be subject to approval by the EPA and contingent upon a schedule for ultimate removal of the PCB-containing caulk.

-Steve Armann

From: Armann, Steve **Sent:** Friday, June 27, 2014 8:52 AM **To:** 'Doug Daugherty' **Cc:** Huetteman, Tom; slyon@smmusd.org **Subject:** RE: EPA Comments of the District's PCB Plan -- Clarification on June 4th EPA comment letter on the SMMUSD Comprehensive PCB Plan

Doug (Envrion)

... as we mention in our letter, the General Plan is not formally required and is essentially a voluntary action by the District. We look forward to receiving the Malibu High School specific plan next week (July 3rd, 2014)...

-Steven S. Armann, Manager

My kids want to return to their beloved school, teachers and friends, but my son in particular is really afraid about getting cancer again. As their mother I need to ensure they are as safe as possible and the violation of Federal Law and the conflicts with the EPA's own prior written statements are very confusing to me.

On a related note, I think we would all like to see the Prop BB funds being promptly utilized to resolve these issues with PCBs in the caulk (and any other building materials for that matter.)

PS – Here is some info from the EPA's own website regarding caulk:

Why is the Caulk a Potential Source of Exposure?

<http://www.epa.gov/pcbsincaulk/pdf/caulk-fs.pdf>

I pulled out these excerpts (the underlining is mine):

PCBs can affect the immune system, reproductive system, nervous system and endocrine system and are potentially cancer-causing if they build up in the body over long periods of time.

Because PCBs can migrate from the caulk into air, dust, surrounding materials and soil, EPA is concerned about potential PCB exposure to school children and other building occupants.

Schools should attempt to identify any potential sources of PCBs that may be present in the building, including testing samples of caulk and looking for other potential PCB sources (e.g., old transformers, capacitors, or fluorescent light ballasts that might still be present at the school). While it is possible that PCBs could be released into the environment through the cracking or flaking of caulk, EPA believes the old caulk that is still flexible or is in visibly good condition could be a significant source of PCBs into the air. The only way to be sure that caulk has PCBs is to have a professional test the caulk.

PCB sources off-gas and can not be controlled unlike Asbestos that when left untouched (not friable) do not contaminate the environment.

Based on EPA's Office of Research and Development's laboratory research, states encapsulation was found to be most effective for interior surfaces that contain low levels of PCBs.

Encapsulation was not found to be effective in reducing emissions from sources that have a high PCB content (for example caulk) for more than a short period of time.

From: Beth Lucas [<mailto:blucas4@verizon.net>]
Sent: Monday, August 04, 2014 6:07 PM
To: 'Huetteman, Tom'; 'Wilson, Patrick'
Cc: 'Scott, Jeff'; blumenfeld.jared@epa.gov; Armann.Steve@epa.gov; 'Beth Lucas'
Subject: RE: QUESTIONS FOR EPA - PLEASE PROVIDE WRITTEN RESPONSE

Correction, maybe one or two of my initial questions are addressed in the other documents, but my more specific questions are not.

Thank you again in advance for responding.

Best regards,

Beth

From: Beth Lucas [<mailto:blucas4@verizon.net>]
Sent: Monday, August 04, 2014 5:53 PM
To: 'Huetteman, Tom'; 'Wilson, Patrick'
Cc: 'Scott, Jeff'; blumenfeld.jared@epa.gov; Armann.Steve@epa.gov; 'Beth Lucas'
Subject: RE: QUESTIONS FOR EPA - PLEASE PROVIDE WRITTEN RESPONSE

Hello Tom and All,

Thank you for your reply.

However, with all due respect, my questions are pretty specific and are not addressed by these documents which I have already read in detail.

I have always believed in the critical importance of the EPA to our nation. And now I am relying on the EPA as being critically important to the safety, health and well-being of my children in regards to the PCB situation at their schools...

Please do not let me down. Please give me the courtesy of a direct and thorough response to each question and not a roundabout response through other documents.... If you choose not to respond specifically, how am I supposed to interpret that? Your organization doesn't have the answers? Your organization doesn't want to give me the answers? I am going to be trusting and assume that neither is the case and that you can coordinate a specific and thorough response in a timely manner within the next few days. Again, this is a reasonable request. I don't have that many questions...

Please let me know when I can expect a response.

School starts in a few weeks. I have a child who had stage 4 brain cancer at age 6. He is now 15. I have some pretty valid reasons for my questions and concerns.

If you need another day or two, please just let me know. I will just have to follow-up with my son's Dr. again. But, please do not refer me to documents that do not address my specific questions. My children and I deserve better than that.

And, if you are only willing to speak with me about this and not put a response in writing, can you please tell me why? There is no valid reason for not giving me the courtesy of a specific and written response which can ensure no misunderstandings.

I am trusting that someone can coordinate with the individuals you mention and get back to me in a reasonable timeframe within the next few days.

Please advise.

Thank you.

Beth Lucas

From: Huetteman, Tom [<mailto:Huetteman.Tom@epa.gov>]

Sent: Monday, August 04, 2014 5:26 PM

To: Beth Lucas; Wilson, Patrick

Cc: Scott, Jeff

Subject: RE: QUESTIONS FOR EPA - PLEASE PROVIDE WRITTEN RESPONSE

Dear Beth,

We have recently received a number of written questions and comments about PCBs at Malibu High School. Our written responses are coordinated through several individuals with different roles in the project and in some cases with our HQ office. I apologize that I am not able to provide you a written response to all of your specific questions in the timeframe you requested.

I have attached two documents that address some of your questions. One is a letter sent last week to Senator Boxer and the other was sent a few months ago to Malibu Unites. As outlined in these documents, we evaluate the public health concerns from PCBs in schools through the testing of air and dust. In 2013, a low number of dust samples with elevated PCBs was identified as a concern at the High School. This led to implementing the current cleaning practices that are proving effective at addressing this concern. At the High School, all but one air sample is below EPA's public health level. Work is underway to address the one air sample above this level.

Again, we would be happy to speak with you by phone if you want to arrange a call.

Sincerely,

Tom Huetteman, Assistant Director
RCRA Branch, Land Division, USEPA Region 9
415-972-3751

From: Beth Lucas [<mailto:blucas4@verizon.net>]
Sent: Monday, August 04, 2014 12:10 PM
To: Huetteman, Tom; Wilson, Patrick
Cc: 'Beth Lucas'
Subject: QUESTIONS FOR EPA - PLEASE PROVIDE WRITTEN RESPONSE
Importance: High

Hello Tom and Patrick,

I greatly appreciate you reaching out to me.

Unfortunately I am extremely ill with a serious infection... headed back to bed right now. Tomorrow, I am running around to back-to-back doctor's appointments for both my son and I.

However, having a response to my questions is really important and I greatly prefer to have it in writing anyhow so as to ensure I do not misinterpret anything. I find that in taking notes in a conversation, there is room for error, so again, I need to have this information in writing please.

I had an appointment with one of Christian's specialists tomorrow at 11 which is why I really needed to have a written responses today, to discuss with his doctor.

Can you please send me what responses you can to my questions today (I assume you have much of this handy...) so I am prepared going into my son's appointment? And if there is any missing info, If you could send it tomorrow, before 11, that would be great.

I would love to speak with you as a follow-up, once I am feeling better, but need this information now (in writing) so I can make some important decisions. Having a child who has already had cancer, I need to be super careful and vigilant.

Please advise if you can help me out with a written response today. Again, a formal written response that you can stand by is a more than reasonable request and then I am happy to follow-up later with a phone conversation. Also, some of my questions are missing. Please see just below.

Thank you so much.

Best regards,

Beth

PS –Again, it also appears you did not receive my follow-up questions below. I am looking for a written response to these as well. Thanks you so much.

ADDITINOAL QUESTIONS:

Dear EPA Representatives, SMMUSD Board and Ms. Lyon,

I just reviewed the materials sent by Valerie Martinez, who I assume is an outsourced PR rep (spending more of our taxpayer dollars on communication rather than thorough testing and remediation...)

I have concerns and questions with much of what I read, but in particular let's focus on the following excerpt/statement by Mr. Blumenfeld to Senator Boxer:

“ I concur that the TSCA regulations do not authorize the use of building materials containing PCBs above 50 ppm. The District's plan submitted to EPA on July 3, 2014, proposes to remove PCB-containing material in the four classroom during renovation or demolition of the buildings. This proposal is currently under review. During the week of August 11 we will provide our conclusions about the work conducted this summer by the District and outlining a path forward for completing removal of PCBs required under TSCA. School opens the following week.”

1 If this issue was found in caulk in 4 classrooms, have you taken caulk samples from ALL of the pre-1979 classrooms or high occupancy rooms on campus?

If the answer is no, why not, and how on earth can you assure us that the campus is safe?

It may be temporarily very, very clean from this summer's activities, but if the sources are not first comprehensively identified and then removed, the PCBs will continue to pollute the air and dust, and then there is also the possibility of absorption (especially if PCBs are found in conjunction with certain other compounds or solvents) or ingestion!

#2 Is it not specifically a Federal Violation to leave these PCBs in place, period!? Not to wait for some future demolition that is TBD....and how could you possibly advocate putting children and teachers back in those rooms?

“TSCA's Federal Law requires the removal of PCBs of more than 50 parts per million (ppm)”

A.) So, why on earth, is the EPA not enforcing this Federal law at Malibu High School?

B.) Why has EPA region 9 actually endorsed the school district to limit its investigation to air and dust by not testing any other building materials (such as caulk) for sources of PCBs when they were found in the building materials in 4 classrooms as you noted above?

And I assume those 4 classrooms do not include the additional classrooms where extremely high elevations of PCBs were found in the caulk this summer at Juan Cabrillo and Malibu High School.

C.) Have you retested the caulk in room 19 at Juan Cabrillo or room 506 at the High School? If not, why not?

Please explain this to me and maybe you should send another letter to Senator Boxer, explaining this to her too, as I simply do not understand this seemingly blatant violation of the law which will obviously put teachers and students at risk.

And please explain the EPA's support of limited testing when known problems in violation of TSCA's Federal Law have been found in the building materials in multiple locations on the campus!

#3 You state school starts the following week, do you seriously intend to support sending children and teachers back into those classrooms? And into any classroom that have not had the caulk or building materials tested? And how can you support a plan that does not call for the immediate removal and remediation of those PCBs?

And, I still have my additional questions as noted below.

I received no response to the below today. Your communication package sent by Ms. Martinez did not specifically address my questions, it actually left me with the extremely horrified and disappointed conclusion that the EPA is not going to help ensure the enforcement of Federal Law and is not going to advocate for the building materials/caulk testing needed for assurance that our campus has been thoroughly tested and safe. How appalling!

Mr. Blumenfeld, please prove my conclusion wrong and ensure the immediate enforcement of Federal Law!

Please reconsider if you are truly comfortable with the appalling and in my humble opinion negligent approach of not thoroughly testing caulk samples in all high occupancy rooms on the campus given the TSCA violations that have already been found on campus as you documented!

I look forward to a response on Monday.

Thank you.

Beth Lucas

... "Still" an Extremely Concerned Parent

From: Huetteman, Tom [<mailto:Huetteman.Tom@epa.gov>]

Sent: Monday, August 04, 2014 11:28 AM

To: blucas4@verizon.net

Cc: Wilson, Patrick

Subject: FW: FOR SMMUSD, EPA AND MS. LYON: URGENT QUESTIONS / NEED RESPONSE ASAP

Importance: High

Ms. Lucas,

We would like to give you a call to go over the questions that you have below. Is there a phone number we can reach you at? Patrick Wilson, our toxicologist, has been working extensively on the Malibu PCBs issues and I would like him to call you when he is back in the office tomorrow.

Thank you, Tom

Tom Huetteman, Assistant Director
RCRA Branch, Land Division, USEPA Region 9
415-972-3751

From: Beth Lucas <blucas4@verizon.net>

Sent: Friday, August 1, 2014 1:45:04 AM

To: Blumenfeld, Jared; Scott, Jeff; Armann, Steve; brd@smmusd.org; slyon@smmusd.org; llieberman@smmusd.org

Cc: Laura Z. Rosenthal; Dr. Laura Z. Rosenthal; llamonte@malibucity.org; Skylar Peak; jsibert@yahoo.com;

jhouse@malibucity.org

Subject: FOR SMMUSD, EPA AND MS. LYON: URGENT QUESTIONS / NEED RESPONSE ASAP

Dear EPA Representatives, SMMUSD Board and Ms. Lyon,

I have some rather urgent questions for you as I decide if I am going to return my children to their beloved schools in just a few weeks. When I moved to Malibu over 18 years ago (in large part for the great schools!) I never would have dreamed I would be in this horrible position and situation that parents across Malibu are grappling with.

First, I do not have the Environ contact e-mail address handy and it is the wee hours of the morning... although they have never responded to any of my prior e-mails this past year (which is extremely unprofessional to say the least, and has not fostered any credibility with me personally,) maybe you can urgently asap forward this on to them? However since they have a history of non-responsiveness to me, I am asking each and every one of you to be accountable to providing me with a prompt response (today, or Monday, or sometime in-between) to my few very simple questions below.

I know there is "talk" of a panel discussion being set-up which would be great, albeit truly and appallingly far too late in the game, since school starts in just over two weeks (and many key players may be on end of summer vacations.)... As you know, that panel discussion is not scheduled to-date... and I need answers now and I need to make some difficult decisions within the next few days.

#1. Can you please confirm what, if any caulk sampling and testing for PCBs you have done at Malibu Middle, Malibu High School or Juan Cabrillo Elementary Schools over the past year?

I urgently need to know this asap since my 15 year old son already had cancer once at age 6, and I am not willing to risk the horror of this again, especially if it can be prevented.

I need to know what due diligence you have done this summer (or in the past year) on this very important topic.

#2. If you have not performed any caulk testing for PCBs, can you please explain exactly why and how you can assure any parent that our schools are safe?

#3 Can you briefly tell me what testing you have done and did the EPA actually approve such testing (and if so when?) and has there been oversight, and if so what and by whom at what agency?

#4 Other than PCBs, what is a complete list of any other compounds or toxins that you have tested for and what testing protocols did you use? I have seen no details on this, so my assumption is you have not been testing for anything other than PCBs... Please confirm or deny.

If you have not tested for anything other than PCBS, what was your rationale for that decision?

#5 If you have not tested any caulk, I assume you have not tested for any other compounds that might be present in the caulk. Please confirm in specifics.

#6 Can you please kindly send me the report that identifies exactly what toxins and chemical compounds were found and at what levels in the significant amount of dirt that the district removed several years ago from the Malibu Middle School quad?

Also, where and how was that toxic dirt disposed of?

#7 Do we have any actual DTSC findings from their tests of the soil over the past year and if so what tests were performed and what were their findings?

I assume given all of your due diligence, this is all documented, easy to access and these are super easy questions for you to all respond to, so in the interest of time, if you could please reply sometime later today (Friday), over the weekend, or Monday, at the latest I would greatly appreciate it.

I have a unique set of circumstances, since my 15 year old had cancer at age 6. I need answers. I cannot wait any longer... I have patiently been waiting and trusting for almost a full year and I need answers to these questions now.

Please do not refer me to a website or lengthy document, please, one of you or all of you, kindly give me the courtesy of a prompt and specific e-mail response to each question above.

I only have 7 questions, so I assume this should be easy for one of you to take on and address.

If you cannot respond within two business days (Friday being day one, since it is just approaching 1:30 AM, so by no later than the end of the day Monday 8/4), please kindly respond asap and tell me why, although I will have to tell you that will cause me a great deal of concern and skepticism if you cannot very promptly respond to questions you should clearly very easily have the answers to given how high profile this issue is and all of the activities you have been conducting over the past year and this summer. What I do know is that I have been told by numerous sources that the school is very clean, which is really great. But I personally need answers to the above.

Needless to say, I am extremely concerned about what has transpired over the past year and for both of my precious children's health and I am running out of time to make some extremely important decisions.

I greatly appreciate your prompt response. I am relying on you.

Thank you.

Beth Lucas
Extremely Concerned Parent

PS - My initial message which no-one responded to is below. Please someone, respond to me specifically and personally to my above listed questions. Thank you. Please do not ignore me and please answer specifically, as your constituent, I deserve that and so do my children.

From: Beth Lucas [<mailto:blucas4@verizon.net>]
Sent: Tuesday, July 22, 2014 12:09 PM
To: blumenfeld.jared@epa.gov; scott.jeff@epa.gov; Armann.Steve@epa.gov; brd@smmusd.org
Cc: supporter@malibuunites.com; support@malibuunites.com; 'Beth Lucas'; Jennifer DENICOLA
Subject: Please Take The Following Prompt Action to Keep Our Children Safe (MHS)

Dear EPA Members and SMMUSD Board Members,

We urgently need your help as follows with the horrific PCB situation at the Malibu High School and Juan Cabrillo Campuses.

I agree with Malibu Unites to strongly urge the following from the EPA so that they do not approve leaving PCBs in place for 15 years!:

1. Order SMMUSD to remove students from any potential exposure, until full source testing and remediation has been completed. School starts on August 19. Please ensure that students at MHS and JC have a place to be educated that is free of PCBs. ie: provide portable (pcb-free) classrooms for any rooms that violate 50ppm until which time renovation or full remediation has been completed.
2. Order SMMUSD to immediately test all the caulk/building materials suspected of containing PCBs in all classrooms constructed or renovated pre-1979
3. Order SMMUSD to immediately remove all PCB material in excess of 50ppm that is in violation of TSCA
4. Reject Environ's second PCB plan as wholly inadequate and in violation of TSCA regulation. There is no legal basis for leaving illegal levels of PCBs in place for 15 years. Fines under TSCA should be levied on the district for every day that they have not provided an appropriate plan since their due date of March 30th, 2014.

I support [Malibu Unites' formal letter](#) sent to the EPA to reject Environ/district's plan to leave PCBs in place for 15 years.

I have two precious children who attend Malibu Middle and High Schools. My son Christian, age 15 already had a brain tumor/cancer at age 6. He, nor any other child should unnecessarily be exposed to PCBs or any other carcinogens at their school. Parents should be confident that their children are safe in their schools!

Thank you,

Best regards,

Beth Lucas
Extremely Concerned Parent